

## **Exhibit I**

**Rachel L. Christofilakes**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF  
RACHEL L. CHRISTOFILAKES**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY    )  
                                  : SS.:  
COUNTY OF UNION        )

RACHEL L. CHRISTOFILAKES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 42 Hilltop Avenue, Berkeley Heights, NJ 07922.

2. My current age is 36, having been born on May 20, 1985.

3. I am the daughter of Chris Christofilakes, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from glioblastoma on January 8, 2012. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad was always there to help me. We loved to cook together and to go down the shore. He was handy and could fix anything, and he loved to golf. When I came home from college, I moved back in with my parents. I got engaged right before he was diagnosed with brain cancer. My fiancée and I were supposed to move out, but all of a sudden everything was thrown up in the air when my dad became sick.

6. My dad was a court officer at the New York Supreme Court on Centre Street. He was assigned to a different location on the morning of 9/11/2001, but returned to the exposure zone that evening to help with the clean-up. My dad was the first to come running whenever there was any kind of problem. That's the kind of person he was. He worked around the clock on the clean-up. He worked as a court officer until Summer 2011. His post at the courts was outdoors, so he was breathing in all the dust floating around in the exposure zone. I was only sixteen when it happened, and my dad didn't want to upset me with the details. My aunt also worked in the exposure zone on the clean-up. Two weeks after 9/11, I remember asking my aunt about the survivors they were finding in the pile. She told me, "We aren't finding people, we're just finding bodies." I also remember the governor of New Jersey saying that the air was safe on TV. I just knew that wasn't right. Why did we think that those paper masks were okay? My father was breathing in layers of metal, asbestos, and concrete. The politicians knew it wasn't really okay.

7. My mother and father went on a vacation right before he was diagnosed with cancer, when my dad started to have tingling in one of his sides. We didn't know it at the time, but that was a seizure related to his brain cancer. Even before my dad was diagnosed, I started to realize some symptoms. At his and my mother's 25-year anniversary party in December 2008, he seemed so tired. At my engagement party in November 2009, my dad was supposed to cook but he was too weak to do it by himself. After the vacation where he felt tingling in his side, my dad went in for an MRI with contrast. He was diagnosed with brain cancer in January 2010, when I was supposed to move out of his house. Everything happened really fast. He had surgery in late January 2010 to remove part of the brain tumor. This was the kind of cancer that could kill you in four months, but the surgery would help him live another two years.

8. My mom did the majority of his day-to-day care, but I did a lot to keep him comfortable and be his company. I brought him dinner a lot when he was in the rehab facility. I don't know how my mom survived, truly, she did everything for him. I feel like I lost thirty or forty years with my father. He was generally a healthy man, and he didn't have any diseases. He missed out on so much. Now, I have two kids, who he never got to meet. My brother got married, and my dad wasn't there at his wedding. My brother bought a house, and we got a shore house. He would have loved to see that. My husband and I work really hard, and I know my father would be proud of us. My father worked three jobs because he wanted us to never

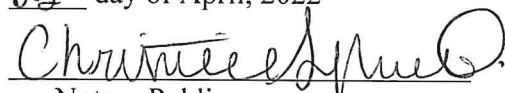


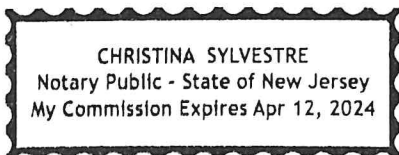
worry about money. He'll never see how much we have now and that's sad. He did everything for us.

9. I want to see some accountability on behalf of those who caused or contributed to 9/11. I don't know if it's possible.

  
RACHEL L. CHRISTOFILAKES

Sworn to before me this  
22<sup>nd</sup> day of April, 2022

  
Notary Public



**Rose Christofilakes**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF  
ROSE CHRISTOFILAKES**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY    )  
                              : SS.:  
COUNTY OF MONMOUTH)

ROSE CHRISTOFILAKES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 182 Tarpon Drive, Sea Girt, NJ 08750.
2. My current age is 62, having been born on March 5, 1960.
3. I am the wife of Chris Christofilakes, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My husband passed away from glioblastoma on January 8, 2012. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. Chris was my first love and my best friend. We did everything together as husband and wife. We raised three kids together. We did the typical couple things, like going out to dinner, and we renovated a house together. We had a whole plan for the future. Chris loved to play golf, and I was taking some golf lessons so that when we finally got to retire we could play together. We liked to vacation together, hang out with friends, the usual stuff.

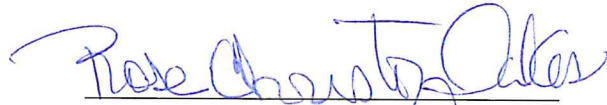
6. Chris worked as a court officer. on September 11<sup>th</sup> 2001, he was working in Manhattan. As soon as he learned of the attacks on the World Trade Center, he went running down there to help in whatever way he could. He spent a few days working on search and recovery at Ground Zero. We forced him to wear a mask, since my sister-in-law is a respiratory therapist and knew the air wasn't clean. No one was wearing them at the time, so we don't know if he kept his mask on, although he said he did. His bosses later sent him to Centre Street, where he worked directing traffic and making sure the area was secure. Chris worked at the courts on Centre Street and Beaver Street until his retirement in December 2011.

7. Years later, we went on vacation for our anniversary. During the vacation, his arm started spasming and moving on its own. Chris had recently had an injury and was scheduled to have surgery, so we mentioned it to the surgeon. The surgeon sent us to a neurologist. The neurologist did an MRI with contrast, which revealed a mass in Chris's brain. He was diagnosed with Stage IV glioblastoma. We talked to different doctors before finding a surgeon at Columbia to remove Chris's brain tumor. After the surgery, he did a few rounds of chemotherapy. They gave him a special chemo for brain cancer. They also radiated right onto the brain mass. It gave him some time, but later the cancer started to come back. The radiation was just too much on his brain—I don't think he would've wanted to go through more pain.

8. I was still working while Chris was ill, so it was stressful. I was his primary caretaker during the time that he was sick. He would pretty much have to have someone watching him at all times. At first, he could feed himself and watch TV, but at the end he was getting confused and lost the ability to be independent. My sons helped me out. Before we had nurses and aids coming in to help him, we were taking care of him all the time. Toward the end, I started to stay home from work. I saw his condition really deteriorate. He couldn't speak, couldn't communicate, or anything like that. I just didn't expect it to all happen so fast. He was diagnosed and passed away within two years.

9. Chris was so loved. He was just like the mayor. He had so many friends. There were so many people at the house to see him while he was sick. He loved life, and he was so personable. We had many laughs together, so many good memories together. We were high school sweethearts. He missed a lot. He missed endless family celebrations, weddings, and grandchildren. It was terrible to watch him go that way. In normal times, he was such a verbal, outgoing person. He made everybody laugh. Seven or eight months before his death, he

couldn't write or communicate in any way. We tried with pictures, but he couldn't get his message across. When someone's at the end of their life, especially when it's someone you love, there's so many things you want to say to them. And we weren't able to do that. That's my biggest regret. So, if you love someone, tell them.

  
ROSE CHRISTOFILAKES

Sworn to before me this  
19th day of April, 2022

  
Notary Public

Sandra M. Iammatteo  
Attorney-At-Law  
State of New Jersey

**John Paul DeFrancisci**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF  
JOHN PAUL DeFRANCISCI**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF NASSAU     )

JOHN PAUL DeFRANCISCI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2094 Bergen Street, Bellmore, New York 11710.

2. I am currently 34 years old, having been born on February 12, 1988.

3. I am the son of Thomas DeFrancisci, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer on April 12, 2019. It was medically determined that this illness was causally connected to his exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was very involved in my life. We would often go camping since I was a Boy Scout and he was my scout leader. We enjoyed doing many father-son activities. I looked up to my dad, and we were very close. Before my dad's illness, I relied on his guidance. Although I lived with my parents, I was in college. I knew I could call my dad at any time for anything, and he'd always answer. He taught me how to drive and always gave me great advice.




6. My dad was a volunteer EMT with the Bellmore Merrick EMS on 9/11. He drove to Shea Stadium to be staged before proceeding to the World Trade Center site. He was there right after the attacks happened and worked an overnight shift. After that, he went back one or two more times before the EMTs were dismissed. He brought me with him to the ambulance parking lot in Bellmore to clean out the truck, which was completely covered in soot. That gave me an idea of how bad the dust was at Ground Zero.

7. I was in college when my dad was diagnosed with lung cancer. After the doctors discovered the tumor, he was scheduled for surgery at Memorial Sloan Kettering to remove a piece of his lung. My family rented rooms in a hotel near the hospital so we could all be there for the surgery. We believed that the surgery would be successful and his cancer would be gone forever. He did well after the surgery. However, after a year or two, his cancer had come back and had metastasized. He was on chemotherapy treatment for a while. Due to the chemo, all of his hair fell out. It seemed as if he was always in pain. Whenever he ate, the pain would increase. He would sit with his head between his arms at the dinner table. It was hard for me to see him going through that.

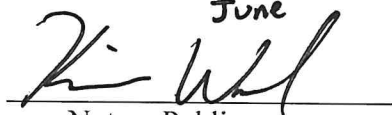
8. I was totally in denial over my dad's illness. I would always say to myself, "Oh, he's sick, but he's going to get better." I believed that until the very last day of his life. It was impossible for me to imagine life without him. Sometimes, I think my life would have been different if I still had him here. It was hard to see him let go of things as he became more ill. It became apparent that he couldn't go places by himself. He wasn't even able to drive. We had to take him into the city for his cancer treatments. All of the energy seemed to drain out of his body. I remember in the early stages of his cancer, he got a new bicycle, but he had a hard time keeping his balance on it. I was following after him on foot down the street, making sure he didn't fall. One of our neighbors commented, "Look at that guy. He can't even stay on top of that bike." I got so angry and felt terrible for my dad.

9. As my dad's illness progressed, I helped take care of him at home. After a while, he couldn't eat. The doctors put him on TPN (Total Parenteral Nutrition), which was intravenous feeding. I helped hook him up to his feeding bag, which would go into his bloodstream. I could tell by his facial expression that it felt awful for him. I always had a lump in my throat when I'd see him like that.

10. There are so many things I wish my dad could have been here for. When my sister Lucy had her daughter, she was my parents' first grandchild. My dad wasn't able to enjoy spending time with her the way he would have wanted to. And now our family is growing. He would have been such a loving grandparent because he was a giving person. Some people like to be in the spotlight, but my dad was never that person. It's like driving—some people weave through lanes, trying to get ahead, but others are content to take it at their own pace. That was my dad. He preferred to let others be in the spotlight. He lived a very fulfilled life, a life that was defined by helping others. I miss him every day.

  
JOHN PAUL DeFRANCISCI

Sworn to before me this  
29 day of ~~May~~, 2022

June  
  
Notary Public

KEVIN WARD  
NOTARY PUBLIC - STATE OF NEW YORK  
NO. 01WA6420758  
QUALIFIED IN NASSAU COUNTY  
COMMISSION EXPIRES 08/16/2025

**Rosemary DeFrancisci**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW, et al,

**AFFIDAVIT OF**  
**ROSEMARY DEFRANCISCI**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK )

: SS.:

COUNTY OF NASSAU )

ROSEMARY DEFRANCISCI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2094 Bergen Street, Bellmore, New York 11710.

2. I am currently 60 years old, having been born on July 26, 1961.

3. I am the wife of Thomas (Tommy) DeFrancisci, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from lung cancer on April 12, 2019. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was very blessed to meet Tommy at a young age. I was nineteen and he was twenty-three. From the time we met, we were closely involved in each other's lives. We were married for nearly thirty-three years when he passed. Without a doubt, he was my best friend, in addition to being a wonderful husband. I miss him tremendously. He opened my world. I was a city girl, and he was from the suburbs. He would travel to Brooklyn to see me, and it was always

an adventure. I experienced more with him than I would have without him. He wanted to show me the world. We had a wonderful friendship and relationship.

6. Thomas was an EMT for the Bellmore Ambulance Corps. He responded to the World Trade Center site on September 11, 2001. He was very close to the action. He was very close to a building that was in the process of crumbling. He was assisting other emergency responders and the NYPD in the area near the World Trade Center. When he drove his ambulance back home, it was covered in soot. I remember the clothes he wore to the site were covered in dust. I wondered to myself if I should even be touching them. I questioned if they were safe.

7. Around the end of 2008, Tommy developed a bad cough. He went for some testing, and then some more testing. What we thought was a simple cough turned out to be a unique lung tumor. We were surprised, as he was a healthy man. He had never even smoked. It was suspicious to me that they found a tumor on his lungs because he was an active, healthy, and health-conscious person. Following his diagnosis, Thomas went through many treatments, which he endured with tremendous bravery.

8. We were always researching, going to new doctors, and seeing new cancer specialists. We always hoped for another treatment, something more effective. We even talked about going to Europe for an experimental cancer treatment. I remember looking at our savings and thinking that his health was a priority and whatever the cost to us would be worth it. There were huge time commitments and financial commitments when it came to Thomas's cancer treatments. He had to leave work on disability, which was hugely demoralizing to him, especially since he had always thought of himself as a capable person.

9. Time ran out on us, even though Tommy had cancer for ten years. It was unthinkable to lose him. Losing him was very sudden. It was like a curtain dropping in my life. Before Tommy's death, I thought about my future in the long-term. I thought about retirement and a new phase of our lives. Now, after his death, I just live day-to-day. I try to stay sane and functional. There's no one who I'm very close to now. I don't have an intimate sense of connection with anyone anymore. Running our family was a two-person job. We needed each other. My moments with my grandchildren are bittersweet. Where is their grandfather? He would have brought such love, stability, joy, and learning to their lives.




10. Tommy was a tremendously supportive family man. He was responsible, cared for his family, and he had willingness to self-sacrifice. I'm not saying he was always carefree, but I had a husband who gave me such a sense of security. We knew we would have challenges and that times wouldn't always be easy, but we never had doubt that together we could get through anything. It was so hard getting through losing him.

11. A friend of ours most recently said, "Everyone who I lost [to a 9/11-related illness] would do it again tomorrow." That was true of Tommy. I knew the minute the towers were hit that he would go down there, running in to help. For all the suffering he endured, he wouldn't hesitate to put himself on the line again. He had very few sorrowful moments. He didn't pity himself. He once said to me, "There's going to come a time when I'm not here to protect my family." That was his saddest point. I didn't want to believe it. That time has come, and now we're living that reality. He was a giving man. He had more life to live.

  
ROSEMARY DEFRANCISCI

Sworn to before me this  
29 day of ~~May~~, 2022

  
Notary Public

KEVIN WARD  
NOTARY PUBLIC - STATE OF NEW YORK  
NO. 01WA6420758  
QUALIFIED IN NASSAU COUNTY  
COMMISSION EXPIRES 08/16/2025

**Laura Marie Peña**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF**  
**LAURA MARIE PENA**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF NASSAU     )

LAURA MARIE PENA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1951 Stuyvesant Avenue, Merrick, New York 11566.

2. I am currently 31 years old, having been born on December 21, 1990.

3. I am the daughter of Thomas DeFrancisci, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer on April 12, 2019. It was medically determined that this illness was causally connected to his exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. Everything we did, we did as a family. My father was very involved in every aspect of my life. I was a Girl Scout, and my dad would go on trips with us. He was always eager to know what we were up to. In general, I think I am most like him. I have a very similar temperament. He was the calm one in our family. It's hard to describe, but more than anyone else, I'm like him. I see so much of him in me. In that way, he's still with me.

6. My father was a volunteer for the Bellmore Merrick EMS, an ambulance corps made up of all volunteers. He belonged to that ambulance company my entire life. I always remember him waking up in the middle of the night having to respond to emergencies. Our house was right around the corner from the ambulance garage. On 9/11, I was in the fifth grade. As soon as I learned about the attack on the World Trade Center, I knew my dad would be there. My dad waited to be staged at Shea Stadium before proceeding to the World Trade Center. He worked there all night and came home the next day. I know he went back either the next day or the day after to respond again.

7. I was in the twelfth grade when I learned that my dad was diagnosed with lung cancer. He went to a very cautious doctor, who wanted to run more tests on him when he saw something was off. One of the tests found something on his lung. As more results came in, we learned he had lung cancer. He was a runner, so he was fit and active. I was on the track team, and we would run together. We even ran a half-marathon right before he was diagnosed. He had always been a very healthy person. I was shocked to learn he had lung cancer. In January 2009, he had surgery to remove the mass from his lung and things were good for about a year. We were watching the cancer.

8. In 2010, the doctors found spots on his liver that turned out to be cancerous. He underwent radiation after that, and then infusion chemo. He would have regular visits with his oncologist, where he would try different types of chemotherapy. We eventually got to the end of the chemotherapy treatments, and the only option would be to try them all again. My family would rally to go to as many of his doctors' appointments as we could. I was in college nearby, so I accompanied him to lots of visits. In later years, I was living in Queens, and I would visit him at Sloan Kettering Hospital. One of us was always there with him. I would take breaks from work just to eat lunch with him in the hospital. He was so happy to see me on those lunch breaks. It was like we weren't even in a hospital. He was always in such good spirits.

9. It was easy to stay positive when he was positive. In a way, that made it harder for me to truly understand the seriousness of his illness until things took a turn for the worse. He couldn't eat and his quality of life was declining in the last several months of his illness. But we were all hopeful that there was a next treatment, a next step. The last year of his life was like whiplash. Everything sped up so quickly, and we all soon realized that my father wasn't going to get better. My mind didn't have enough time to process the fact that there wasn't going to be

a next step. I couldn't even admit that to myself until the last week of his life. I was never in that mindset of, "Oh, I'm someone whose dad is dying." I just had that caretaker mentality. We took care of him for so long that the end was just like a shock. I felt like the roadrunner, not even realizing that I had run off the cliff. When he died, I felt like I had gone over a cliff and there was nothing beneath me to catch my fall. There was no warning, even though he had been sick for ten years. I definitely wasn't prepared to lose him.

10. I think my father represents the best in me. He was the most loving and caring man I've ever known. He was the best kind of person there is. I recently had a son, and I know that my dad would have adored him. It hurts me every day that my son will never know my dad. My dad loved his family, and he was loved beyond words. The world is a worse place without him.

  
\_\_\_\_\_  
LAURA MARIE PENA

Sworn to before me this  
5<sup>th</sup> day of May, 2022

  
\_\_\_\_\_  
Notary Public

BARBARA TATEO  
Notary Public, State of New York  
No. 01TA4962776  
Qualified in Richmond County  
Commission Expires 06/17/2022

**Lucy Anne Quartararo**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF  
LUCY ANNE QUARTARARO**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF NASSAU     )

LUCY ANNE QUARTARARO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3621 Southview Avenue, Wantagh, New York 11793.

2. I am currently 36 years old, having been born on April 20, 1986.

3. I am the daughter of Thomas DeFrancisci, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer on April 12, 2019. It was medically determined that this illness was causally connected to his exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad and I were very close. Our whole family was close. My father was very involved in everything we did. He liked camping, physical activities, walking, and running. He loved the beach, swimming, and we always did family vacations that included a long hike. We all enjoyed doing outdoorsy activities together. I could talk to my dad about anything, and we talked all the time. I remember during one college course, the professor asked the class, "Who are you more likely to call, your mother or your father?" I was the only one who said I'd call my dad. I



truly looked up to my dad.

6. My father was an EMT with the Bellmore Ambulance Corps. He always loved helping people. On September 11, 2001, he went with the ambulance corps to be staged at Shea Stadium before proceeding to the World Trade Center. He worked an overnight shift the first night, and then he returned the next day. He was there for a total of about twenty hours. I remember that he wore this old ventilator mask. We know now that it didn't work. He described what he saw—the destruction, the ash everywhere. If you asked him anything about 9/11, he would tell you whatever you wanted to know, but he never brought it up on his own.

7. In 2008, my dad started to have a cough. He went to his doctor, who was overly cautious and wanted to do a chest x-ray. The x-ray found a mass on his right lung. He went sent to a specialist, who said it was fine. But my dad wanted to get a second opinion. The second doctor suggested that the mass be biopsied. That's when we found out my dad had lung cancer.

8. In January 2009, my dad underwent surgery to remove the portion of his lung containing the mass. We thought that he would be cured and that would be the end of it. We monitored him for a few years, thinking he'd be fine. In 2011, the doctors found cancerous spots on his liver that they hadn't seen before. That made me so mad. Why hadn't anyone seen them before? He started chemotherapy treatment, which made him weak and caused his hair fall out. He finished his first round of chemotherapy in the Fall of 2011. After that, he continued with chemo pills and other treatments.

9. As a family, we wanted someone to be with my dad at all times. We would always go to my father's appointments, oftentimes as a family. We would drive him to Sloan Kettering every week. I would sit with him in the hospital, even on difficult days. He used to get fluid buildup and the nurses had to drain him. It looked so painful. My heart broke every time he had to go through that. It was stressful to deal with his cancer all the time. It became all-consuming. It touched every part of our lives, especially in the last year of his life. We were always able to stay positive, because my dad was always positive. As he became more ill, it was harder for him to stay positive. We tried to put on a happy face for him, but privately it was very hard to feel that way. We knew he was suffering.

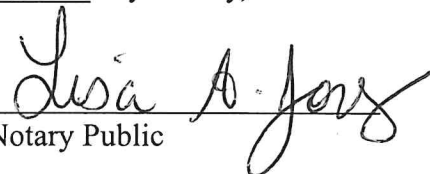
10. Dealing with my father's cancer was a very sobering experience, and it always bothered me

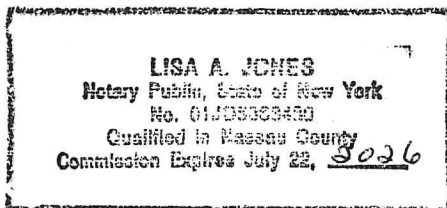
under the surface. It tested me emotionally and spiritually. In the last several months of my father's life, I recognized that I was depressed. I couldn't be with him as much as I wanted to because I was busy taking care of my young daughter. When my father passed away, I was pregnant with my son. My dad never got to meet my son. I wish he could have been alive to be the grandfather that I know he could be.

11. My father was a generous person in every respect. When I left my first college, he dropped everything to help me move back home, no questions asked. He never made me feel bad about it. He was a volunteer in so many organizations—Boy Scouts, our church, everything. He would pick up the phone whenever we called, even if he didn't have time to talk. Since he's been gone, I miss having someone who will always answer the phone when I call. Even when he got sick, he would talk with me whenever I wanted. Even now, when I call my mom's house, he still "picks up the phone," because his voice is on the answering machine. Sometimes I just close my eyes and take comfort that we can still hear his voice.

  
LUCY ANNE QUARTARARO

Sworn to before me this  
15<sup>th</sup> day of July, 2022

  
Notary Public





**Carol Ann Brady**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF  
CAROL ANN BRADY**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF BRONX     )

CAROL ANN BRADY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3175 Grand Concourse, Bronx, New York 10468.
2. I am currently 58 years old, having been born on November 1, 1963.
3. I am the sister of Thomas P. Doepfner, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My brother passed away from melanoma on April 6, 2016. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. My brother and I had a great relationship. When I struggled with alcohol addiction, my brother helped me get sober. We always saw each other on holidays and at family gatherings. We lived fairly close to each other and would see each other often. I would sometimes visit him at work.

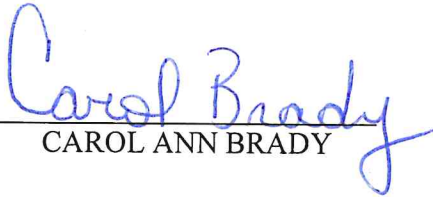
6. Thomas worked as an Assistant Deputy Commissioner of Legal Affairs for the New York Police Department. His office was at 1 Police Plaza, but he worked all around the city. He was on his way to work when the attacks occurred on 9/11. He ran into a building with Mayor Giuliani as the towers came down. Thomas described the scene to me and said that it was very disturbing. People were running in all directions with ashes on their faces. He was petrified, but it didn't deter him from doing his job. He went back to work every day after that. Thomas loved his job and was committed to working.

7. My brother was first diagnosed with prostate cancer. I was shocked to learn that he had cancer. At first, we didn't think it could be connected to his exposure at Ground Zero. I then realized how many others were getting sick and dying from 9/11-related illnesses. Thomas's cancers came one after the other. He had surgery for prostate cancer and went through chemotherapy and radiation. It didn't work because the cancer returned. He also was on dialysis for kidney disease. I remember seeing the dialysis machine in his house. He had a stent in his arm and underwent dialysis every day. He was treated at a hospital in Queens because he wanted to be near his wife and kids. He had many ailments related to his 9/11 exposure.

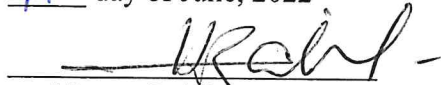
8. Thomas was forced to retire due to his illness. He loved working; he talked about it all the time. He would often tell me all his stories with the police department. He didn't want to retire, and it upset him that he had no choice. Thomas also didn't want anyone worrying about him relative to his illness. He tried keeping the extent of his condition and the torture he was going through to himself.

9. Later, he was diagnosed with melanoma, which then spread to his brain. It was an awful time for me because my other brother had recently died from a heart attack. Thomas didn't live long enough to walk his daughter down the aisle or see her college graduation. My own daughter was having a baby, and Thomas didn't live to see her be born. It was a tough and depressing time for our whole family. We missed a lot of good times together. Thomas was the head of the family. He ran everything. It was hard for all of us when he passed away. At his

funeral, his colleagues said many beautiful things about him. He was a good man, and he is truly missed.

  
CAROL ANN BRADY

Sworn to before me this  
14<sup>th</sup> day of June, 2022

  
Notary Public

HARUNUR RASHID  
Notary Public, State of New York  
Bronx County, # 01RA6114955  
My Commission Expires  
August 30, 2024

**Cassandra Doepfner**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF  
CASSANDRA DOEPFNER**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK )

: SS.:

COUNTY OF NASSAU )

CASSANDRA DOEPFNER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 175 North Beech Street, Massapequa, New York 11758.

2. I am currently 28 years old, having been born on June 3, 1994.

3. I am the daughter of Thomas P. Doepfner, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic melanoma on April 6, 2016, at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad was my best friend. He was my "person." He coached all of my sports teams. We spent every day together. He took me to school, picked me up from practices, ran errands with me, and ate dinner with me every night. We did everything together.

6. My father was driving into work on the morning of 9/11. He was the Assistant Deputy Commissioner for the NYPD. The first plane hit the World Trade Center when my dad



was driving through the tunnel. When he got to work, he saw the second plane hit the towers. He went down to Ground Zero and was there for the day, helping remove people from the area. He came home in the middle of the night the following day and went back every day over the next several weeks to help with the rescue and recovery efforts. He said it was horrible—the whole area was covered with dust and debris, as was everyone working down there. My father worked for 30 years with the NYPD.

7. My dad was first diagnosed with prostate cancer. I was pretty young, so I don't remember exactly what year it was. I remember him going into surgery and seeing him in the hospital. I also remember that he was wearing a urine bag on the sideline of one of my soccer games. I don't remember all the details.

8. In October 2012, my dad was diagnosed with Stage II melanoma. I had just started my freshman year at college. He had one surgery where he had a scalp resection, and after that surgery, the doctors told us his margins were clear. In February 2015, he went back to the doctor and was told that the cancer had spread to his brain. I was shocked and upset since I honestly believed that he was cancer-free. My dad had brain surgery to remove the tumor. I was anxious and upset, waiting for him to come through the surgery. He had multiple rounds of chemotherapy and radiation. My father suffered for fifteen months before his death in 2016.

9. I was one of my father's primary caretakers. I took him to all his doctor's appointments, radiation treatments, follow-ups, and chemotherapy treatments. When he had to go to the emergency room, I would ride in the back of the ambulance with him. I stayed by his side during all his hospital visits and after his surgeries. At the time, I was a full-time nursing school student. I had to miss classes, clinical rotations, and exams to care for my father.

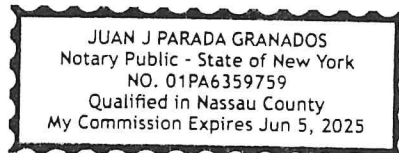
10. It was devastating for my dad to lose his independence. He always did everything for himself and everyone else. It was hard for him to be limited. He was always tired and in and out of the hospital. Due to his cancer, he was forced to retire from the NYPD in 2016. He wouldn't have retired if he didn't get sick. He was dedicated to his career and his children.

11. It has been extremely hard for me since I lost my father. It's hard for me to talk about even now. I cry and get upset when I talk about it. I suffered from a lot of anxiety after my father's passing. He missed out on a lot. He wasn't there for my nursing graduation or my nurse practitioner graduation. He wasn't there to walk me down the aisle at my wedding. He didn't get to see my brother graduate or get his CPA degree. He wasn't here to see me buy my



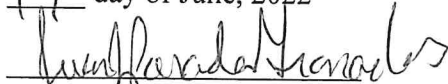
first home. Birthdays, holidays, and family events aren't the same without him. He should've been here for all of that.

12. My dad was the most selfless person I had ever met. He would do anything for anyone. It's a shame that this happened to him. It upsets me to think that he will one day be out of my life for more years than he was in my life. This could have been prevented.



  
CASSANDRA DOEPFNER

Sworn to before me this  
17 day of June, 2022

  
Notary Public

**Joanne Doepfner**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF  
JOANNE DOEPFNER**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK )

: SS.:

COUNTY OF QUEENS )

JOANNE DOEPFNER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 15-55 201<sup>st</sup> Street, Bayside, New York 11360.

2. I am currently 63 years old, having been born on January 7, 1959.

3. I am the wife of Thomas P. Doepfner, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. Thomas passed away from metastatic melanoma on April 6, 2016, at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My husband and I were very close. We were college sweethearts and were married for over thirty years. We raised two beautiful children together. We had a good relationship with no difficulties. Thomas supported me, and I supported him.

6. Thomas was working for the New York Police Department on 9/11. He was working at Police Headquarters at One Police Plaza. Immediately following the attacks, he went

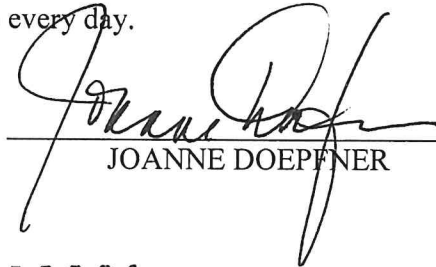
down to Ground Zero to help out. He was the Assistant Deputy Commissioner of Legal Affairs. He was upset and angry that something like that could happen, and he was pretty emotional about it. He became worried for a long time. Thomas and I had many friends in the FDNY and NYPD, and the losses were troubling to us. On the day of the attacks, he and I tried contacting family and friends to ensure everyone was okay. It wasn't easy to reach anyone because the phone lines were down all over the city. It was all quite upsetting. Thomas went to work every day, assisting in recovery efforts and spending time between his office and Ground Zero. He worked for the NYPD for over 30 years.

7. After 9/11, Thomas started to lose energy. He was generally a healthy person who lived an active lifestyle. He played golf, softball, and was involved in coaching our children's sports teams. Several years after 2001, he was diagnosed with prostate cancer. He had a successful prostatectomy, and the doctors removed the tumor. He went for regular checkups and testing after that. In 2015, Thomas was diagnosed with Stage IV melanoma. By the time the doctors found it, it had spread to his brain. He underwent brain surgery, radiation, and regular follow-ups, including bloodwork, CAT scans, and PET scans. Thomas was treated at North Shore Manhasset Hospital and Montefiore Cancer Center in New Hyde Park.

8. I was Thomas's primary caretaker. I helped him to take his medication and monitored him in the house. He insisted that I keep working, so that's what I did. I was a high school teacher at the time and had to juggle the responsibilities of my teaching job and taking care of my husband. There was no "family leave" at the time, so I had to use days off and sick days to care for my husband. Some of our friends and family came in to help as well. Thomas also had kidney failure, so he was on dialysis. His at-home dialysis was time-consuming and would require hours out of my day. I also had to carefully measure his medications and coordinate his taking them to line up with his dialysis.

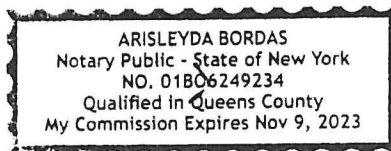
9. Thomas's illness and death had a long-term emotional impact on my life. From the time of 9/11 to his illness to his death, all of it has affected me emotionally. Certainly, since his passing, I deeply appreciate my time with him. When he was given the terminal diagnosis, it devastated me, knowing I would lose him. I still have moments of great sadness. I feel for my kids. The loss hasn't gone away, and I feel it every day. I have some days where I'm stronger and some sad days. Somber days. But I need to keep moving forward.

10. Thomas was a family man. He was very involved with our children and was a wonderful father. He was very proud of his job and hated having to retire from the NYPD. He was a role model for many of his colleagues, as well as to our children. His death was a true loss; we are reminded of that daily. Thomas wasn't with me to see our daughter graduate from nursing school and get her nurse practitioner degree. He wasn't there to walk her down the aisle at her wedding or have a father/daughter dance. He wasn't there to dance with me at her wedding. We should have cheered our daughter on together when she bought her first home. He wasn't there with me to celebrate our son's achievements. He missed out on so many things he would have been overjoyed about—things we should have shared together. It was a terrible loss for everyone, but especially for me. He was my college sweetheart. He was my rock. His memory lives in my kids and me, and we miss him every day.

  
JOANNE DOEPFNER

Sworn to before me this  
16 day of June, 2022

  
Notary Public



**Timothy P. Doefpner**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF**  
**TIMOTHY P. DOEPFNER**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF NASSAU     )

TIMOTHY P. DOEPFNER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 90 Schenck Avenue, Apt. 1N, Great Neck, New York 11021.

2. I am currently 33 years old, having been born on February 17, 1989.

3. I am the son of Thomas P. Doepfner, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from melanoma on April 6, 2016, at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad was a huge part of my life. He was a very supportive and loving father throughout my life. He coached my little league team and would never miss a school event. My dad and I also enjoyed golfing together. I lived with both of my parents until after I graduated college.

6. On 9/11, my father was working at Ground Zero, helping with the rescue efforts. He was an Assistant Deputy Commissioner of Legal Matters for the NYPD. He was driving into work when he saw the second plane hit the World Trade Center, but he didn't turn around because he knew he had to help. Our family had no contact with him for about twenty-four hours. It was a terrifying time. After 9/11, my father was at Ground Zero every day assisting with rescue efforts; he coordinated clean-up and recovery for the NYPD. I believe he worked in a command station close to Ground Zero. His office was at 1 Police Plaza, just a few blocks from Ground Zero. He didn't give me too many details about what he witnessed. I understood that he didn't want to talk about it when he came home from work. He worked for the entire duration of the clean-up efforts through the end of May 2002. My father worked for the NYPD for about 30 years but was forced to retire when he became sick, about six months before he passed away (in 2016).

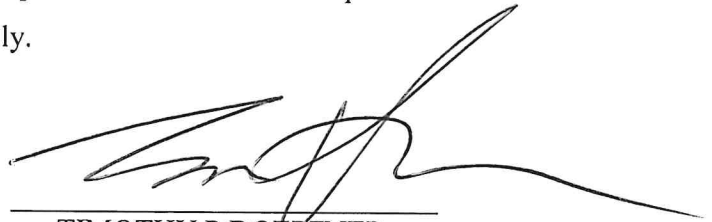
7. My father was a very healthy person with an active lifestyle. He liked going to the gym, golfing, and doing other outdoor activities. He was in near-perfect health until he began to fall ill in the years after 9/11. Initially, my father was diagnosed with prostate cancer in 2013, shortly after I graduated college. He had his prostate removed in hopes of removing the tumor. In 2015-16, he was diagnosed with melanoma, which ultimately spread to his brain. He had brain surgery to remove the tumor and one other surgery. He also had chemo and radiation treatments throughout his illnesses.

8. My father lost the ability to do what he wanted when he became sick. He constantly went back and forth to doctor's appointments and radiation treatments. He couldn't drive anymore because he started to have seizures due to the cancer. He couldn't do daily activities like shopping, gardening, cleaning, and housework. I took over many of the responsibilities at home for him. He needed assistance doing virtually everything in his day-to-day life. He was pretty much incapacitated.

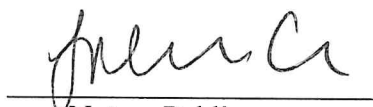
9. Doctor visits and cancer treatment became his whole life. After his prostate cancer was removed, my father began to have trouble with his kidneys. He had at-home dialysis. I lived at home then, so I helped him with his treatment. It took four hours per night, five days per week. It was a considerable time commitment for my whole family and me. I always went to visit my father when he was in the hospital.

10. It was incredibly difficult for me to deal with my father's illness from the time of his diagnosis until his death. It was a 180-degree turn in my life. I had just graduated college and was looking forward to my post-grad experience when my father became ill. I had to reconfigure my life and my family's life to deal with my father's condition. It wasn't his fault at all, but we had to bear the burden of his sickness and death. My father missed out on my sister's wedding. Pretty much every family event since his passing hurts without him. We've had to move on, but it's hard.

11. Through no fault of his own, he got sick. He tried to live a healthy lifestyle, and when he got sick, he went to all his treatments and took all his medications. My dad did everything by the book. He was the most incredible person I ever knew. It's deplorable what happened to him, and as a result, to my entire family.

  
TIMOTHY P DOEPFNER

Sworn to before me this  
16th day of June, 2022

  
Notary Public